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**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
**1947 Galileo Court, Suite 103, Davis, CA 95616**  
**(530) 757-3650**

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**TITLE V OPERATING PERMIT**  
**Permit Number: F-00209-0**

**ISSUED TO:**

Fleetwood Homes of California, Inc. #17  
PO Box 1308  
Woodland, CA 95776

**PLANT SITE LOCATION:**

18 N. Pioneer Avenue  
Woodland, California

**ISSUED BY:**

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Larry Greene, Air Pollution Control Officer

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Date

PROPOSED                      October 23, 2000

EFFECTIVE                      January 18, 2001

EXPIRATION                      January 18, 2006

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Nature of Business:  
SIC Code:

Manufactured Housing Production  
2451

**Responsible Official:**

Name: Erik Bloemendaal  
Title: General Manager  
Phone: (530) 662-3223

**Site Contact Person:**

Name: James Villa  
Title: Assistant Purchasing Manager  
Phone: (530) 662-3223

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**I. FACILITY EMISSION UNITS AND EQUIPMENT LISTS:**

**Insignificant Emissions Units**

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided exemption status has not changed as defined in current district or federal rules. The equipment listed in Table 1 is a partial listing of equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to Rule 3.2 of the Yolo-Solano Air Quality Management District.

Table 1. Exempted And Insignificant Emissions Units (partial listing)

Exempt Equipment Description	Basis for Exemption
Electric space heaters	District Rule 3.2 Section 113
Miscellaneous welding equipment	District Rule 3.2 Section 113
Spray texture equipment	District Rule 3.2 Section 113
Self bagged woodworking equipment	District Rule 3.2 Section 113
Chop saws	District Rule 3.2 Section 113
Handheld woodworking equipment	District Rule 3.2 Section 113
"Foamseal" application equipment	District Rule 3.2 Section 113
Insulation blowing equipment	District Rule 3.2 Section 113

**Significant Emissions Unit Information**

Each of the sources has been constructed pursuant to issuance of an authority to construct in accordance with District Rules 3.1 and 3.4.

**Identification Number: P-8-95(a)**

Equipment Description: Manufactured home assembly operation including miscellaneous painting and adhesive application equipment

Control Equipment: None

**Identification Number: P-55-79(a1)**

Equipment Description: Woodworking operations associated with mobile home manufacturing including miscellaneous woodworking equipment with a total electric motor horsepower not to exceed 125.

Control Equipment: Torit Model HPT 160 baghouse with 160 3" x 6" oval x 96" long bags and 50 HP blower.

## **II. SPECIFIC UNIT REQUIREMENTS**

### **Emission Limits**

1. The amount of VOC emitted shall not exceed 23 lb VOC/per floor on a quarterly basis (a floor is a single wide unit or one-half of a double wide unit). [District Rule 3.4/C-98-195]
2. The daily VOC emissions shall not exceed 640 lb per day, 20,332 lb per calendar quarter and 40.6 tons per year. [District Rule 3.4/C-98-195]
3. The daily PM10 emissions shall not exceed 40.8 lb per day, 2,254 lb per calendar quarter and 4.5 tons per year. [District Rule 2.11 and District Rule 3.4/C-99-52]

### **Work Practice and Operational Requirements**

4. The permit holder shall not apply any architectural coating which contains more than 250 grams of volatile organic material per liter of coating as applied, excluding water. [District Rule 2.14]
5. Solvents used for cleaning coating and adhesive application equipment shall not exceed 950 grams of VOC per liter of material and a VOC composite partial pressure of 35 mm Hg or less at 20 C. [District Rule 2.31 § 301.3]
6. The permit holder shall not perform solvent cleaning operations unless one of the following cleaning methods is used:
  - a) Wipe cleaning;
  - b) Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents, as defined in District Rule 2.31, are applied without a propellant-induced force;
  - c) Cleaning equipment which has a solvent container that can be, and is, closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and repair to the cleaning equipment itself. [District Rule 2.31 § 302]
7. All VOC-containing materials used in solvent cleaning operations, regardless of their VOC-content, such as solvents, and cloth and paper moistened with solvents, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying. [District Rule 2.31 § 304]

8. The VOC content of adhesives used for specific applications shall not exceed the amounts listed in the following table:

LIMITS VOC - Less Water and Exempt Compounds (Grams per Liter)	
Application	Limit
Multipurpose Construction	200
Indoor Floor Covering	150
Ceramic Tile Installation	130
Single Ply Roof Material Installation	250
Structural Glazing	100
Plastic Cement Welding Adhesive/Primer	450
Solvent Welding Adhesive/Primer	450
Adhesive and Wash Primers	250
Staple and Nail Manufacturing	640

[District Rule 2.33 § 301.1]

9. The VOC content of adhesives used for non-specific applications shall not exceed the amounts listed in the following table:

LIMITS VOC - Less Water and Exempt Compounds (Grams per Liter)	
Material Bonded	Limit
Metal to Metal	30
Porous Materials	150
Plastic Foam	120
All Other Substrates	250

The higher of the two limits from the above table applies to the bonding of two dissimilar substrates. [District Rule 2.33 § 301.2]

10. Spray application of adhesives shall only be performed using airless, air assisted airless, high volume low pressure, disposable aerosol containers, or electrostatic spray equipment. [District Rule 2.33 § 301.3]
11. Closed containers shall be used to store adhesive products, cleaning materials, or other VOC-containing materials except when accessed for use. [District Rule 2.33 § 303.1]
12. Self-closing containers shall be used for the disposal of all adhesive products, cleaning materials, or other unused VOC-containing materials in such a manner as to effectively control VOC emissions. [District Rule 2.33 § 303.2]
13. The total floors produced shall not exceed 16 per day, 884 per calendar quarter and 3,530 per year. [District Rule 3.4/C-98-195 and C-99-52]
14. All woodworking equipment, excluding, hand-held equipment, self bagged equipment and chop saws, shall be vented to the baghouse. [District Rule 3.4/C-99-52]

15. The permittee shall not discharge from the baghouse any contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is as dark or darker in shade than 5% opacity. [District Rule 3.4/C-99-52]

### **Monitoring and Testing Requirements**

16. Operator shall perform a complete inspection of the dust collection system and its components on an annual basis. Baghouse bags shall be inspected for any evidence of particulate matter breakthrough and shall be replaced as needed. [Rule 3.8 § 302.5]
17. Visible emissions from the baghouse shall be inspected quarterly during operation. If visible emissions cannot be eliminated within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [Rule 3.8 § 302.5]

### **Recordkeeping Requirements**

18. The permittee shall keep accurate records of the amount and type of each VOC-containing cleanup material used, VOC content and the vapor pressure. The records shall be compiled on a monthly basis, kept for a period of five years and made available to the District upon request. [District Rule 2.31 § 501]
19. Permittee shall keep records of all adhesives used at the facility. The records shall include the name of the adhesive, the specific application of the adhesive, the VOC content in grams/liter or the percent VOC for spray adhesives and the applicable Rule 2.33 VOC limit. The records shall be kept with the permit and maintained for a period of five years. [District Rule 2.33 § 501]
20. The permittee shall maintain a list of the current paint and adhesive application equipment used at the facility. The list shall be maintained with the permit. [District Rule 3.4/C-98-195]
21. The permittee shall maintain a list of the current wood-working equipment used at the facility. The list shall contain the horsepower rating of the equipment and be maintained with the permit. [District Rule 3.4/C-99-52]

22. The permittee shall keep accurate records of the amount and type of VOC containing materials used in the assembly of manufactured homes at the facility. The amount of VOCs used shall be calculated on a quarterly basis. The records shall be compiled on an annual basis and submitted to the District prior to March 31st for the previous calendar year. [District Rule 3.4/C-98-195]
23. The permittee shall keep accurate records of the amount of floors assembled at the facility. The amount of floors assembled shall be recorded on a daily basis. The records shall be compiled on an annual basis and submitted to the District prior to March 31st for the previous calendar year. [District Rule 3.4/C-98-195 and C-99-52]
24. Records of dust collection system maintenance, inspections and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [Rule 3.8 § 302.5]

### **III. FACILITY WIDE REQUIREMENTS**

#### **Opacity**

25. The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:
  - a. As dark or darker in shade as that designated as No. 2 on the Ringlemann Chart as published by the United States Bureau of Mines; or
  - b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition. [District Rule 2.3]

### **Nuisance**

26. The permit holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [This permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California State Implementation Plan (SIP). The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only]

### **Circumvention**

27. The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

### **General Permit Requirements**

28. No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1 § 301.1]
29. No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1 § 302.1]

30. No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1 § 302.2]
31. The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1 § 405.3]

#### **IV. TITLE V GENERAL REQUIREMENTS**

##### **Right of Entry**

32. The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:
  - a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
  - b. Inspection and duplication of records required by the permit to operate; and
  - c. Source sampling or other monitoring activities. [Rule 3.8 § 302.10]

##### **Compliance with Permit Conditions:**

33. The permittee shall comply with all Title V permit conditions. [Rule 3.8 § 302.11a]
34. The permit does not convey property rights or exclusive privilege of any sort. [Rule 3.8 § 302.11b]

35. Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [Rule 3.8 § 302.11c]
36. The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [Rule 3.8 § 302.11d]
37. A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [Rule 3.8 § 302.11e]
38. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:
  - a. Compliance with the permit; or
  - b. Whether or not cause exists for a permit or enforcement action.[Rule 3.8 § 302.11f]

**Emergency Provisions:**

39. Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
  - (i) An emergency occurred;
  - (ii) The permittee can identify the cause(s) of the emergency;
  - (iii) The facility was being properly operated at the time of the emergency;
  - (iv) All steps were taken to minimize the emissions resulting from the emergency; and
  - (v) Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. [District Rule 3.8 § 302.12]

### **Severability**

40. If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [Rule 3.8 § 302.13]

### **Compliance Certification**

41. The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [Rule 3.8 § 302.14a]
42. The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [Rule 3.8 § 302.14b]
43. The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [Rule 3.8 § 302.14c]
44. The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [Rule 3.8 § 302.14d]

### **Permit Life**

45. The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [Rule 3.8 § 302.15]

### **Payment of Fees**

46. An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [Rule 3.8 § 302.16]

### **Application Requirements**

47. An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [Rule 3.8 § 402.2]
48. An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [Rule 3.8 § 402.3]
49. An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:
- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
  - b. Proposed permit terms and conditions; and
  - c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [Rule 3.8 § 402.4]

### **Permit Reopening for Cause**

50. Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:
- a. The need to correct a material mistake or inaccurate statement;
  - b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
  - c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
  - d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [Rule 3.8 § 413.1]

### **Recordkeeping**

51. The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:
- (i) Date, place, and time of sampling;
  - (ii) Operating conditions at the time of sampling;
  - (iii) Date, place, and method of analysis; and
  - (iv) Results of the analysis. [District Rule 3.8 § 302.6a]
52. The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8 § 302.6b]

### **Reporting Requirements**

53. Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[Rule 3.8 § 302.7a]

54. A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of Rule 3.8. [Rule 3.8 § 302.7b]
55. All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [Rule 3.8 § 302.7c]
56. Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [Rule 3.8 § 302.7e]